

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JOSHUA SAYLOR,

Plaintiff,

v.

REALPAGE, INC.,

Defendant.

Case No. 1:22-cv-00053-AJT-IDD

**PLAINTIFF'S MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

Plaintiff Joshua Saylor (“Plaintiff”), individually and on behalf of all other similarly situated individuals, moves for preliminary approval of the proposed class action settlement. For the reasons discussed in the accompanying memorandum, Plaintiff respectfully moves this Court for entry of an Order:

- a) Finding that the Federal Rules of Civil Procedure and all other requirements for certification of a settlement class have been satisfied, and certifying the Settlement Class;
- b) Preliminarily approving the Settlement Agreement as fair, reasonable, and adequate;
- c) Finding that the notice procedure set forth in the Settlement Agreement satisfies the requirements of due process and applicable law and procedure;
- d) Setting a date for the hearing at which the Court will finally determine the fairness, reasonableness, and adequacy of the proposed settlement (the “Final Fairness Hearing”);
- e) Appointing Plaintiff as Class Representative of the Settlement Class;

- f) Appointing Berger Montague PC as Class Counsel to the Settlement Class; and
- g) Appointing Continental DataLogix LLC as Settlement Administrator.

Defendant RealPage, Inc. does not oppose this motion. For good cause shown, Plaintiff's

Motion should be granted.

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